

REMARKS

The Official Action mailed January 24, 2008, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Filed concurrently herewith is a *Request for Continued Examination*. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on February 20, 2004; October 11, 2005; October 30, 2006; May 8, 2007; and July 20, 2007.

Claims 1-9, 11-27, 61 and 62 were pending in the present application prior to the above amendment. The Applicant notes with appreciation the allowance of claims 12-14 and 24-27 (Box 5, Office Action Summary; page 12, Paper No. 20080115). Claims 61 and 62 have been canceled without prejudice or disclaimer, and claims 1, 6, 9, 15 and 20 have been amended to better recite the features of the present invention. Accordingly, claims 1-9 and 11-27 are now pending in the present application, of which claims 1, 6, 9, 12, 15, 20 and 24 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The Official Action rejects claims 1, 4-6, 15 and 16 as obvious based on the combination of U.S. Publication No. 2003/0032210 to Takayama and U.S. Publication No. 2002/0146893 to Shimoda. The Official Action rejects claims 2 and 3 as obvious based on the combination of Takayama, Shimoda and U.S. Patent No. 6,703,267 to Tanabe. The Official Action rejects claims 7, 8, 18 and 19 as obvious based on the combination of Takayama, Shimoda and U.S. Patent No. 6,885,032 to Forbes. The Official Action rejects claims 9, 11, 10, 21, 23, 61 and 62 as obvious based on the combination of Takayama, Shimoda, Forbes and U.S. Publication No. 2004/0256644 to Kugler. The Official Action rejects claim 17 as obvious based on the combination of Takayama, Shimoda and U.S. Publication No. 2002/0027247 to Arao. The Official

Action rejects claim 22 as obvious based on the combination of Takayama, Shimoda, Forbes, Kugler and Arao. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some reason, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some reason to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. Independent claims 1, 6 and 15 to recite a memory comprising a first semiconductor film on and in contact with an insulating film; and a transistor comprising a second semiconductor film, a gate insulating film, and a gate electrode, where the second semiconductor film is formed on and in contact with the insulating film. Independent claims 9 and 20 have been amended to recite that an antenna is formed on and in contact with a gate insulating film. For the reasons provided below, Takayama and Shimoda, either alone or in

combination with one or more of Tanabe, Forbes, Kugler and Arao, do not teach or suggest the above-referenced features of the present invention.

Regarding claims 1, 6 and 15, the Official Action asserts that "Shimoda discloses a first semiconductor film used as a memory" (pages 2-3, Paper No. 20080115). Also, in the "Response to Arguments" section, the Official Action asserts that "Shimoda's disclosure is directed to thin films of semiconductor layers, as evident by for example paragraph [0003] disclosing use of materials such as silicon" (page 13, Id.). However, the Applicant notes that this portion of Shimoda discloses that "[t]he thin film transistors are classified into those using amorphous silicon (a-Si) and those using polycrystalline silicon (p-Si) ..." (paragraph [0003]). As such, it appears that Shimoda merely discloses a thin film transistor (TFT) using silicon but not a memory comprising a semiconductor film.

In any event, the Applicant has amended claims 1, 6 and 15 to recite that first and second semiconductor films are formed on and in contact with an insulating film. These features are supported in the present specification, for example, by Figures 4A to 4C, where the insulating film of the present claims may correspond, for example, to reference number 44. The Applicant respectfully submits that Takayama and Shimoda, either alone or in combination with one or more of Tanabe, Forbes, Kugler and Arao, do not teach or suggest that first and second semiconductor films are formed on and in contact with an insulating film.

Regarding claims 9 and 20, since Kugler's device does not belong to the same field as that of Takayama, Shimoda and Forbes, the Applicant believes that the Official Action still has not provided a sufficient explanation of the reason to combine Kugler with Takayama, Shimoda and Forbes (see also page 14, lines 6-22, of the *Amendment* filed October 31, 2007).

In any event, the Applicant has amended claims 9 and 20 to recite an antenna is formed on and in contact with a gate insulating film. Accordingly, claims 61 and 62 have been canceled. The Applicant respectfully submits that Takayama and Shimoda,

either alone or in combination with one or more of Tanabe, Forbes, Kugler and Arao, do not teach or suggest the above-referenced features of amended claims 9 and 20.

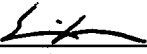
Regarding previously pending dependent claims 61 and 62, the Official Action asserts that "[t]he modification of Kugler further discloses wherein the gate electrode and the antenna are formed over the gate insulating film" (page 10, Paper No. 20080115; emphasis added). The Applicant respectfully disagrees and traverses the assertions in the Official Action. Kugler does not appear to disclose a gate insulating film. Therefore, the Applicant respectfully submits that Kugler does not teach or suggest that an antenna could or should be formed over a gate insulating film. Also, the Applicant respectfully submits that one of ordinary skill in the art at the time of the present invention would not add an antenna formed over a gate insulating film even if sufficient reason were shown to combine Takayama, Shimoda, Forbes and Kugler. Tanabe and Arao do not cure these deficiencies in Takayama, Shimoda, Forbes and Kugler.

Also, in support of the allowability of amended claims 9 and 20, the Applicant notes the allowance of claims 12 and 24, which recite an antenna provided on an interlayer insulating film, which is formed over a semiconductor film, and other features similar to claims 9 and 20. The Applicant respectfully requests review of the rejection of claims 9 and 20 in light of the allowance of claims 12 and 24 and the indication of allowable subject matter at page 12 of the Official Action.

Since Takayama and Shimoda, either alone or in combination with one or more of Tanabe, Forbes, Kugler and Arao, do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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